

Brad T. Hunsicker
(Wyoming State Bar No. 7-4579)
Winship & Winship, P.C.
100 North Center, Sixth Floor
P.O. Box 548
Casper, WY 82602
(307) 234-8991
brad@winshipandwinship.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING

In re:)	
)	
ROCK SPRINGS PROPERTIES, INC.)	Case No. 14-20200
)	CHAPTER 11
Debtor-in-Possession.)	
)	

**MOTION FOR APPROVAL OF SALE OF REAL PROPERTY AND
NOTICE OF TIME TO OBJECT**

COMES NOW Rock Springs Properties, Inc. (“Rock Springs Properties”), as Debtor-in-Possession, by and through its proposed counsel, and pursuant to 11 U.S.C. §§ 363(f) and 1107, and F.R.B.P. 6004(c), hereby seeks authorization to sell free and clear of liens, if any, by private sale to Robin Mettler (“Purchaser”) the real property described in Exhibit “A” attached hereto (“Property”) for the purchase price of \$60,000.00 under the terms set forth in the Real Estate Purchase Agreement (“Agreement”) attached hereto as Exhibit “B”, and in support hereof shows the Court as follows:

1. Rock Springs Properties filed for relief under Chapter 11 of the Bankruptcy Court on March 19, 2014 (the “Petition Date”).

2. Rock Springs Properties has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108.

3. The Property is subject to liens in favor of Les R. Balege, as collateral agent, James Blair, as collateral agent, and Gus Blass III, as collateral agent (collectively referred to herein as the “Bondholder Debt”). The Property is also subject to a lien in favor of Modern Electric Co. (the “Contractor Lien”). The Bondholder Debt is prior in time and right to the Contractor Lien.

4. The Property is not necessary for the reorganization of Rock Springs Properties’ financial affairs.

5. The Property is not being sold pursuant to the auction and bidding procedures approved by the Court on April 15, 2014 (see Doc. No. 32; Order Approving Debtor’s Motion for Entry of an Order Establishing Bidding and Auction Procedures for the Sale of Assets of the Debtor pursuant to § 363 of the Bankruptcy Code (the “Bid Procedure Order”)).

6. The sale proceeds, which constitute cash collateral, will be used for operational expenses and to ensure that Rock Springs Properties will have enough cash on hand to effectuate a sale of substantially all of its assets on May 21, 2014, in accordance with the Bid Procedure Order.

7. Neither Rock Springs Properties nor its principals are owners, officers or employees of Purchaser.

9. Upon the best information and belief, Rock Springs Properties believes that the collateral agents for the Bondholder Debt are agreeable to the proposed sale and the proposed use of their cash collateral.

DATED this 22nd day of April, 2014.

By:___/s/_____

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YOU ARE HEREBY NOTIFIED that if you desire to oppose the Motion for Approval of Sale of Real Property filed with the Court on behalf of Rock Springs Properties, Inc., you are required to file with the Court and serve on Brad T. Hunsicker, attorney for the Movant, whose address is shown above, a written objection to the motion on or before **MAY 16, 2014** or the relief requested may be granted by the Court.

_____/s/_____
Brad T. Hunsicker

CERTIFICATE OF SERVICE

I, Brad T. Hunsicker, hereby certify that a true and correct copy of the foregoing **Motion for Approval of Sale of Real Property and Notice of Time to Object** was served *electronically* upon **all parties requesting notice and registered on the CM/ECF system** and the **United States Trustee's Office**, and **all secured creditors except First Interstate Bank and Modern Electric Co.** as indicated on the *CM/ECF Mailing Matrix* and the *Bondholders Electronic Mailing Matrix* attached hereto, by electronic mail, and upon **First Interstate Bank, Modern Electric Co.** and **all unsecured creditors** by depositing copies thereof in the United States mail, postage prepaid, addressed as indicated on the *Secured/Unsecured Creditors Mailing Matrix* attached hereto, this 22nd day of April, 2014.

_____/s/_____
Brad T. Hunsicker